

UNITED STATES DISTRICT COURT

for the

WASHINGTON WESTERN DISTRICT COURT

SG DEC 27 2019

BY AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

Division

TERI K SAHM

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write: "see attached" in the space and attach an additional page with the full list of names.)

-v-

ONSLOW BAY FINANCIAL, LLC;
SELECT PORTFOLIO SERVICING, INC.
OCWEN LOAN SERVICING, INC.
DBA PHH MORTGAGE,
MTC FINANCIAL INC DBA TRUSTEE CORPS,
BANK OF AMERICA CORPORATION,
WELLS FARGO BANK, N.A.,
MERSCORP HOLDING, INC
U.S. BANK NATIONAL ASSOCIATION
U.S. BANCORP
ANNALY CAPITAL MANAGEMENT, INC.
PLEASE SEE DEFENDANTS SECTION BELOW

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

19 CV - 02090 RSM

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	TERI K. SAHM
Street Address	c/o PO Box 387
City and County	Fall City - King
State and Zip Code	Washington - Zip Code Exempt
Telephone Number	425-222-3526
E-mail Address	terisahm@hotmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	TIMOTHY J. O'BRIEN PRESIDENT SELECT PORTFOLIO SERVICING, INC. 3217 S. DECKER LAKE DRIVE SALT LAKE CITY - SALT LAKE COUNTY UTAH 84119 801-293-1883
Defendant No. 2 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JEFF T. GRAHAM EXECUTIVE VICE PRESIDENT SELECT PORTFOLIO SERVICING, INC. 3217 S. DECKER LAKE DRIVE SALT LAKE CITY - SALT LAKE COUNTY UTAH 84119 801-293-1883
Defendant No. 3 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number Email	ANDREW R WELCH - 14028 VICE PRESIDENT, SENIOR COUNSEL SELECT PORTFOLIO SERVICING, INC. 3217 S. DECKER LAKE DRIVE SALT LAKE CITY - SALT LAKE COUNTY UTAH 84119 801-293-1883 Andrew.Welch@spservicing.com
Defendant No. 8 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JASON H. MILLER GENERAL COUNSEL SELECT PORTFOLIO SERVICING, INC 3217 S. DECKER LAKE DRIVE SALT LAKE CITY - SALT LAKE COUNTY UTAH 84119 801-293-1883

Defendant No. 5 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DUSTIN STEPHENSON VICE PRESIDENT FORECLOSURE SELECT PORTFOLIO SERVICING,INC. 3217 S. DECKER LAKE DRIVE SALT LAKE CITY - SALT LAKE COUNTY UTAH 84119 801-293-1883
Defendant No. 6 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JUSTIN CROWLEY CHIEF FINANCIAL OFFICER SELECT PORTFOLIO SERVICING,INC. 3217 S. DECKER LAKE DRIVE SALT LAKE CITY - SALT LAKE COUNTY UTAH 84119 801-293-1883
Defendant No. 7 Name Job or Title (if known) Street Address City and County State and Zip Code Telephone Number	MICHELLE CRAMPTON SECOND ASSISTANT VICE PRESIDENT SELECT PORTFOLIO SERVICING,INC 3217 S. DECKER LAKE DRIVE SALT LAKE CITY - SALT LAKE COUNTY UTAH 84119 801-293-1883
Defendant No. 8 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JASON H. MILLER GENERAL COUNSEL SELECT PORTFOLIO SERVICING,INC 3217 S. DECKER LAKE DRIVE SALT LAKE CITY - SALT LAKE COUNTY UTAH 84119 801-293-1883
Defendant No. 9 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JACKIE ANDERSON DOCUMENT CONTROL OFFICER SELECT PORTFOLIO SERVICING,INC 3217 S. DECKER LAKE DRIVE SALT LAKE CITY - SALT LAKE COUNTY UTAH 84119 801-293-1883
Defendant No. 10 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	MICHAEL FANIA PRESIDENT ONSLow BAY FINANCIAL, LLC 1211 Avenue of the Americas NEW YORK – ALBANY COUNTY NY 10036 646-728-7992

Defendant No. 11 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CHRISTIAN GRECO VICE PRESIDENT ONSLOW BAY FINANCIAL, LLC 1211 Avenue of the Americas NEW YORK – ALBANY COUNTY NY 10036 646-728-7992
Defendant No. 12 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ALLISON SIMMONS VICE PRESIDENT ONSLOW BAY FINANCIAL, LLC 1211 Avenue of the Americas NEW YORK – ALBANY COUNTY NY 10036 646-728-7992
Defendant No. 13 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KIMBERLY CAPARSO VICE PRESIDENT ONSLOW BAY FINANCIAL, LLC 1211 Avenue of the Americas NEW YORK – ALBANY COUNTY NY 10036 646-728-7992
Defendant No. 14 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KYLE BADARACCO VICE PRESIDENT ONSLOW BAY FINANCIAL, LLC 1211 Avenue of the Americas NEW YORK – ALBANY COUNTY NY 10036 646-728-7992
Defendant No. 15 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JONATHAN KURTZ COMPTROLLER ONSLOW BAY FINANCIAL, LLC 1211 Avenue of the Americas NEW YORK – ALBANY COUNTY NY 10036 646-728-7992
Defendant No. 16 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	PHYLLIS R. CALDWELL CHAIR OCWEN FINANCIAL CORPORATION 2002 Summit Boulevard 6th Floor ATLANTA – FULTON COUNTY GA 30319 561-682-8000

Defendant No. 17 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	GLENN A. MESSINA PRESIDENT AND CEO OCWEN FINANCIAL CORPORATION 2002 Summit Boulevard 6th Floor ATLANTA – FULTON COUNTY GA 30319 561-682-8000
Defendant No. 18 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ALAN J. BOWERS DIRECTOR OCWEN FINANCIAL CORPORATION 2002 Summit Boulevard 6th Floor ATLANTA – FULTON COUNTY GA 30319 561-682-8000
Defendant No. 19 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JENNE K. BRITELL DIRECTOR OCWEN FINANCIAL CORPORATION 2002 Summit Boulevard 6th Floor ATLANTA – FULTON COUNTY GA 30319 561-682-8000
Defendant No. 20 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JACQUES J. BUSQUE DIRECTOR OCWEN FINANCIAL CORPORATION 2002 Summit Boulevard 6th Floor ATLANTA – FULTON COUNTY GA 30319 561-682-8000
Defendant No. 21 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ROBERT J. LIPSTEIN DIRECTOR OCWEN FINANCIAL CORPORATION 2002 Summit Boulevard 6th Floor ATLANTA – FULTON COUNTY GA 30319 561-682-8000
Defendant No. 22 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KEVIN STEIN DIRECTOR OCWEN FINANCIAL CORPORATION 2002 Summit Boulevard 6th Floor ATLANTA – FULTON COUNTY GA 30319 561-682-8000

Defendant No. 23 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	RANDE JOHNSEN PRESIDENT, DIRECTOR MTC FINANCIAL DBA TRUSTEE CORPS 17100 GILLETTE AVE IRVINE – ORANGE COUNTY CA 92614 949-2522-8300
Defendant No. 24 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ALAN BURTON VICE PRESIDENT MTC FINANCIAL DBA TRUSTEE CORPS 500 UNION STREET, SUITE 820 SEATTLE – KING COUNTY WA 98101 844-387-8456
Defendant No. 25 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	RAYMOND DELAVERGNE UNKNOWN MTC FINANCIAL DBA TRUSTEE CORPS 500 UNION STREET, SUITE 820 SEATTLE – KING COUNTY WA 98101 844-387-8456
Defendant No. 26 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	MARISOL A. NAGATA UNKNOWN MTC FINANCIAL DBA TRUSTEE CORPS 500 UNION STREET, SUITE 820 SEATTLE – KING COUNTY WA 98101 844-387-8456
Defendant No. 27 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DELORES L. COMSTOCK AUTHORIZED SIGNOR MTC FINANCIAL DBA TRUSTEE CORPS 500 UNION STREET, SUITE 820 SEATTLE – KING COUNTY WA 98101 844-387-8456
Defendant No. 28 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CHARLES SCHARF CEO AND PRESIDENT WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302

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Defendant No. 29 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	C. ALLEN PARKER - 802937 SENIOR EVP AND GENERAL COUNSEL WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 30 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	WILLIAM M. DALY VICE CHAIRMAN OF PUBLIC AFFAIRS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 31 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DEREK A. FLOWERS SENIOR EVP, STRATEGIC EXECUTION/OPS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 32 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DAVID C. GALLOREESE SENIOR EVP, HUMAN RESOURCES WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 33 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	RICHARD D. LEVY SENIOR EVP, CONTROLLER WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 34 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	MARY T. MACK SENIOR EVP, CONSUMER BANKING WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302

Defendant No. 35 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	AVID MODJTABAI SENIOR EVP, PAYMENTS, VS INNOVATION WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 36 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	AMANDA G. NORTON SENIOR EVP, CHIEF RISK OFFICER WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 37 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	PERRY G. PELOS SENIOR EVP, WHOLESALE BANKING WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 38 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	SCOTT E. POWELL SENIOR EVP, CHIEF OPERATING OFFICER WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 39 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JULIE L. SCAMMAHORN SENIOR EVP, CHIEF AUDITOR WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 40 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JOHN R. SCHREWSBERRY SENIOR EVP, CHIEF FINANCIAL OFFICER WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302

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Defendant No. 41 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	SAUL VAN BEURDEN SENIOR EVP, HEAD OF TECHNOLOGY WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 42 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JONATHAN G. WEISS SENIOR EVP, WEALTH/INVESTMENT MGMT WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 43 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JOHN D BAKER II BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 44 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CELESTE A. CLARK BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 45 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	THEODORE F. CRAVER, JR. BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 46 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ELIZABETH A. DUKE BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302

Defendant No. 47 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	WAYNE M. HEWITT BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 48 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DONALD M. JAMES BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 49 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	MARIA R. MORRIS BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 50 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CHARLES H. NOSKI BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 51 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	RICHARD B. PAYNE, JR. BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 52 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JUAN A. PUJADAS BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302

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Defendant No. 53 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JAMES H. QUIGLY BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 54 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	RONALD L. SARGENT BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 55 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	SUZANNE M. VAUTRINOT BOARD OF DIRECTORS WELLS FARGO BANK, N.A. 420 MONTGOMERY STREET SAN FRANCISCO – SAN FRANCISCO CTY CALIFORNIA 94163 1-866-249-3302
Defendant No. 56 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	BRIAN MOYNIHAN CHAIRMAN OF THE BOARD/CEO BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 57 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DEAN ATHANASIA PRES. CONSUMERS/SMALL BUSINESS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 58 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CATHERINE P. BESSANT COO/CTO BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681

Defendant No. 59 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	SHERI B. BRONSTEIN CHIEF HUMAN RESOURCES OFFICER BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 60 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	PAUL M. DONOFRIO CHIEF FINANCIAL OFFICER BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 61 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CATHERINE P. BESSANT COO/CTO BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 62 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ANNE M. FINUCANE VICE CHAIRMAN BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 63 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	GEOFFREY S. GREENER CHIEF RISK OFFICER BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 64 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CHRISTINE P. KATZIFF CHIEF AUDIT EXECUTIVE BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681

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Defendant No. 65 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	PAUL M. DONOFRIO CHIEF FINANCIAL OFFICER BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 66 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CATHERINE P. BESSANT COO/CTO BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 67 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KATY KNOX PRESIDENT B OF A PRIVATE BANK BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 68 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DAVID G. LEITCH GLOBAL GENERAL COUNSEL BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 69 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	THOMAS K. MONTAG COO/PRES. GLOBAL BANKING MARKETS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 70 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	THONG M. NGUYEN VICE CHAIRMAN BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681

Defendant No. 71 Name job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ANDY SIEG PRESIDENT MERRILL LYNCH WEALTH MGMT BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 72 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ANDREA B. SMITH CHIEF ADMINISTRATIVE OFFICER BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 73 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	BRUCE R. THOMPSON VICE CHAIRMAN, EU SWITZERLAND BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 74 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	SUSAN S. BIES BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 75 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	FRANK P. BRAMBLE, SR. BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 76 Name Job or Title (if known) Company Street Address City and County	ARNOLD W. DONALD BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY

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State and Zip Code Telephone Number	NC 28255 1-704-386-5681
Defendant No. 77 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	MONICA C. LOZANO BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 78 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	LIONEL L. NOWELL III BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 79 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CLAYTON S. ROSE BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 80 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	THOMAS D. WOODS BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 81 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	MARIA T. ZUBER BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 82 Name Job or Title (if known) Company Street Address City and County	SHARON L. ALLEN BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY

State and Zip Code Telephone Number	NC 28255 1-704-386-5681
Defendant No. 83 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JACK O. BOVENDER, JR. BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 84 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	PIERRE J.P. DE WECK BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 85 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	LINDA P. HUDSON BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 86 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	THOMAS J. MAY BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 87 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DENISE L. RAMOS BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 88 Name Job or Title (if known) Company Street Address	MICHAEL D. WHITE BOARD OF DIRECTORS BANK OF AMERICA CORPORATION

City and County State and Zip Code Telephone Number	100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 89 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	R. DAVID YOST BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-704-386-5681
Defendant No. 90 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	MICHAEL D. WHITE BOARD OF DIRECTORS BANK OF AMERICA CORPORATION 100 NORTH TRYON STREET CHARLOTTE – MECKLENBURG COUNTY NC 28255 1-513-632-4234
Defendant No. 91 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	BRANDON WEISS SENIOR VP, CEO MERSCORP HOLDINGS, INC 1818 LIBRARY ST. RESTON – FAIRFAX COUNTY VA 20190 1-703-761-1270
Defendant No. 92 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	FREDDY FELIZ SENIOR VP, CIO MERSCORP HOLDINGS, INC 1818 LIBRARY ST. RESTON – FAIRFAX COUNTY VA 20190 1-703-761-1270
Defendant No. 93 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	SHARON HORSTKAMP SENIOR VP, CHIEF LEGAL AND LEGISLATIVE OFFICER AND CORP SEC MERSCORP HOLDINGS, INC 1818 LIBRARY ST. RESTON – FAIRFAX COUNTY VA 20190 1-703-761-1270
Defendant No. 94 Name Job or Title (if known) Company	AMANDA CROWLEY VP, INTERNAL AUDIT MERSCORP HOLDINGS, INC

Street Address City and County State and Zip Code Telephone Number	1818 LIBRARY ST. RESTON – FAIRFAX COUNTY VA 20190 1-703-761-1270
Defendant No. 95 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DAVID GOONE BOARD OF DIRECTORS MERSCORP HOLDINGS, INC 1818 LIBRARY ST. RESTON – FAIRFAX COUNTY VA 20190 1-703-761-1270
Defendant No. 96 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CHRISTOPHER MCENTEE BOARD OF DIRECTORS MERSCORP HOLDINGS, INC 1818 LIBRARY ST. RESTON – FAIRFAX COUNTY VA 20190 1-703-761-1270
Defendant No. 97 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ANDREW CECERE CHAIRMAN AND CEO US BANK NATIONAL ASSOCIATION 425 WALNUT STREET CINCINNATI – HAMILTON COUNTY OH 45202 1-704-386-5681
Defendant No. 98 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	TERRENCE R. DOLAN VICE CHAIRMAN AND CFO US BANK NATIONAL ASSOCIATION 425 WALNUT STREET CINCINNATI – HAMILTON COUNTY OH 45202 1-704-386-5681
Defendant No. 99 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JAMES L. CHOSY EVP AND GENERAL COUNSEL US BANK NATIONAL ASSOCIATION 425 WALNUT STREET CINCINNATI – HAMILTON COUNTY OH 45202 1-704-386-5681
Defendant No. 100 Name Job or Title (if known)	WARNER L. BAXTER BOARD OF DIRECTORS

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Company Street Address City and County State and Zip Code Telephone Number	U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 101 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DOROTY BRIDGES BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 102 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ELIZABETH L. BUSE BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 103 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	MARC N. CASPER BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 104 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ARTHUR D. COLLINS JR. BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 105 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KIMBERLY J. HARRIS BOARD OF DIRECTORS US BANK NATIONAL ASSOCIATION 425 WALNUT STREET CINCINNATI – HAMILTON COUNTY OH 45202 1-704-386-5681
Defendant No. 106 Name Job or Title (if known)	ROLAND A. HERNANDEZ BOARD OF DIRECTORS

Company Street Address City and County State and Zip Code Telephone Number	U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 107 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DOREEN WOO HO BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 108 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	OLIVIA F. KIRTLEY BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 109 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KAREN S. LYNCH BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 110 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	RICHARD P. MCKENNEY BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 111 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	YUSEF I. MEHDI BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 112 Name	DAVID B. O'MALEY

Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 113 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ODELL OWENS, M.D., M.P.H. BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 114 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CRAIG D. SCHNUCK BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 115 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	SCOTT W. WINE BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 116 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JOHN P. WIEHOFF BOARD OF DIRECTORS U.S. BANCORP 800 NICOLETTE MALL MINNEAPOLIS – HENNEPIN COUNTY MN 45402 1-651-466-3000
Defendant No. 117 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	GLENN A. VOTEK INTERIM CEO AND PRESIDENT ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 118 Name	SERENA WOLFE

Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	CHIEF FINANCIAL OFFICER ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 119 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	ANTHONY C. GREEN CCO AND CHIEF LEGAL OFFICER ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 120 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DAVID L. FINKELSTEIN CHIEF INVESTMENT OFFICER ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 121 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	TIMOTHY P. COFFEY CHIEF CREDIT OFFICER ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 122 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	THOMAS HAMILTON BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 123 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	WELLINGTON J. DENAHAN BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 124	

Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JONATHAN D. GREEN BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 125 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	FRANCINE J. BOVICH BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 126 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KATIE BEIRNE FALLON BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 127 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KATHY HOPINKAH HANNAN BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 128 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KATIE BEIRNE FALLON BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 129 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	KATHY HOPINKAH HANNAN BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 130	

Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	MICHAEL HAYLON BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 131 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	JOHN H. SCHAEFER BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 132 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	DONNELL A. SEGALAS BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY
Defendant No. 133 Name Job or Title (if known) Company Street Address City and County State and Zip Code Telephone Number	VICKI WILLIAMS BOARD OF DIRECTORS ANNALY CAPITAL MANAGEMENT, INC. 1211 AVENUE OF THE AMERICAS, 41 ST FL. NEW YORK – NEW YORK COUNTY NY - 10036 1-888-8ANNALY

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

DEED THEFT UNDER RICO

RICO was enacted by section 901(a) of the Organized Crime Control Act of 1970 (Pub.L. 91-452, 84 Stat. 922, enacted October 15, 1970) and is codified at 18 U.S.C. ch. 96 as 18 U.S.C. §§ 1961-1968.

Violation of the Fair Debt Collection Act codified as 15 U.S.C. § 1692 -1692p

CLAIM of "sole relief and remedy" under Title 50 Section 7 (c) and (e) of 2012

Violation of Lanham Act --- attempted attachment and seizure of Unregistered Trademarks; Title 15, Section 1125 (a) and 11.

Violation of Admiralty, Maritime and Prize Cases, Title 28, Section 1331 (1) and (2) and (12). Violation of Special Maritime and Territorial Jurisdiction of the United States, Title 18 Section 7 (1), (3), (8) and (13).

Violation of The Postal Accountability and Enhancement Act of Title 39, Sections 1-908 and 36213591.

Violation by Presumption of the Public Vessels Act, 46 U.S.C.A. Appendix Sections 781-790 as originally enacted.

Violation of The False Claims Act, Title 31 U.S.C.A. Section 3729 (a) and (7).

Violation of The Foreign Sovereign Immunities Act, Title 28, Sections 1602-1611.

Violation of the United States Statutes-at-Large, Title 12, Section 411.

Administrative Failure by the IRS/Internal Revenue Service for Failure to Produce Credit Vouchers and Proof of Claim as required by the Administrative Procedures Act, the Emergency Banking Act, and the United States Statutes-at-Large, Title 12, Section 411.

Violation of the Geneva Conventions by the United States Department of Defense and United States Department of the Treasury; failure to protect and defend our Persons.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) TERI K. SAHM, is an American State citizen on Washington

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

DEED THEFT UNDER RICO

RICO was enacted by section 901(a) of the Organized Crime Control Act of 1970 (Pub.L. 91-452, 84 Stat. 922, enacted October 15, 1970) and is codified at 18 U.S.C. ch. 96 as 18 U.S.C. §§ 1961-1968.

Violation of the Fair Debt Collection Act codified as 15 U.S.C. § 1692 -1692p

Violation of 18 U.S. Code § 2071 Concealment, removal, or mutilation generally

CLAIM of "sole relief and remedy" under Title 50 Section 7 (c) and (e) of 2012

Violation of Lanham Act --- attempted attachment and seizure of Unregistered Trademarks; Title 15, Section 1125 (a) and 11.

Violation of Admiralty, Maritime and Prize Cases, Title 28, Section 1331 (1) and (2) and (12). Violation of Special Maritime and Territorial Jurisdiction of the United States, Title 18 Section 7 (1), (3), (8) and (13).

Violation of The Postal Accountability and Enhancement Act of Title 39, Sections 1-908 and 36213591.

Violation by Presumption of the Public Vessels Act, 46 U.S.C.A. Appendix Sections 781-790 as originally enacted.

Violation of The False Claims Act, Title 31 U.S.C.A. Section 3729 (a) and (7).

Violation of The Foreign Sovereign Immunities Act, Title 28, Sections 1602-1611.

Violation of the United States Statutes-at-Large, Title 12, Section 411.

Administrative Failure by the IRS/Internal Revenue Service for Failure to Produce Credit Vouchers and Proof of Claim as required by the Administrative Procedures Act, the Emergency Banking Act, and the United States Statutes-at-Large, Title 12, Section 411.

Violation of the Geneva Conventions by the United States Department of Defense and United States Department of the Treasury; failure to protect and defend our Persons.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) TERI K. SAHM, is an American State citizen on Washington

All Defendants involved are attempting to steal the Property and Assets using Deed Theft. They are currently benefiting from the so-called "Mortgage" via servicing and pooling agreements amounting to billions/trillions of dollars...follow the money.

What all defendants are calling a "Mortgage" is in fact a future lease purchase tenancy agreement under conditions of non-disclosure and usury. See attached Declaration of Flag Document Page 16.

Fraud on the Court for the use of invalid instruments.

There is no valid contract in place and there is not a wet-ink signature of the original note that anyone has been able to produce. If there is no note - there is no contract. There is no original note because some PERSON destroyed the note along the way. This is typically done by the title company. See attached flowchart show the current mortgage process.

The so-called "Mortgage" or "Loan" was paid in full from the Cestui Que Vie Estate Trust at the point of origination. This was never disclosed to me.

SELECT PORTFOLIO SERVICING, INC. DEED FRAUD/SIGNATURE FRAUD/NOTARY FRAUD - Continual tampering with the so-called "deed" and so-called "note" with each "notice": addition of a notary fraudulent notary signature, removal of a notary signature, addition of a copy of the allonge, removal of the copy of an allonge, etc. No original wet ink document was provided – only copies of copies.

WELLS FARGO BANK N.A. inserted an Allonge at some point that was not in previous versions of their copies of the so-called "Deed" and so-called "Note". It does not match the integrity of the copy and appears to be a stand-alone document, not attached in any way or even in the same format. There is also no date on the "signature" of the Allonge. No original wet ink document was provided – only copies of copies.

OCWEN LOAN SERVICING, LLC tampering with the so-called "deed" and so-called "note": presenting different versions of the copies – never an original wet ink document.

OCWEN LOAN SERVICING, through the use of semantic deceit and CORPORATE name changes, was paid from the CQV Trust on multiple occasions for each CORPORATE name change.

Semantic Deceit and violation of copyright in the use of my Names: Teri Kealoha Sahm, Teri K. Sahm, Teri K Sahm and Teri Sahm and any and all derivatives; and NAMES: TERI KEALOHA SAHM, TERI K. SAHM, TERI K SAHM, TERI SAHM and any and all derivatives.

Violation of the Fair Debt Collection Act for ignoring relevant information and responding with boiler plate responses – in some cases repeatedly to the point of harassment.

Constructive Fraud.

Failure to acknowledge a valid payment.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Immediate release of any and all claims and lien(s) against the house and property and clear and clean title(s) free of any taxes, fees or fines or any other presumed or purported encumbrance.

In addition, I would like the total amount of money that has been paid out of the Cestui Que Vie Estate trust to each "BANK" or "DEBT COLLECTOR", or "TRUSTEE" or "BENEFICIARY" for this house and property paid to me as relief plus \$30,000 for each occurrence of Copyright infringement on my Names or NAMES.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/27/2019

Signature of Plaintiff by: Teri Kealoha Sahm ©
All Rights Reserved
Without Prejudice

Printed Name of Plaintiff: Teri Kealoha Sahm©, Authorized Representative

B. For Attorneys

Date of signing: _____

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address
